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October 18, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197;
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Dear Ms. Dortch:

On Wednesday, October 17, 2012, John Nakahata and Kasey Chow, on behalf of PhoneAid Communications Corp. dba PhoneAid Wireless ("PhoneAid" or the "Company"), as well as Angela Lemke, President of the Company, and Joseph Lemke, Vice President of the Company, spoke with Kimberly Scardino, Divya Shenoy, and Michelle Schaefer of the Telecommunications Access Policy Division. Jonathan Lechter, also of the Telecommunications Access Policy Division, participated via teleconference. We discussed PhoneAid's Compliance Plan as filed on October 4, 2012.

Angela Lemke gave an overview of the Company, including detail regarding the current operations, current provision of Lifeline service, number of customers in various states, and percentage of retail/Lifeline customers. Mrs. Lemke confirmed the Company's ongoing efforts to re-certify its active Lifeline customer base, stating that the Company has re-certified its Lifeline customer base annually since 2009 for reports to Kentucky. Mrs. Lemke also discussed the Company's enrollment processes and employee training procedures.

We discussed requested changes to the Company's certification form and terms and conditions. Finally, PhoneAid agreed to file a revised Compliance Plan with all suggested changes and additions. Attached is a copy of the presentation deck that was provided at the meeting yesterday. Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ KASEY CHOW

Kasey Chow
Associate at Lance J.M. Steinhart, P.C.
Attorneys for PhoneAid Communications Corp. dba PhoneAid Wireless

Attachment

cc: Angela Lemke
John Nakahata
Kimberly Scardino
Divya Shenoy
Michelle Schaefer
Jonathan Lechter



PHONEAID COMMUNICATIONS CORP. dba PhoneAid Wireless

Federal Communications Commission

October 17, 2012

- » Introduction to PhoneAid
- » Financial & Technical Capability
- » PhoneAid's Lifeline Plans
- » Marketing Plan
- » Enrolling Lifeline Customers
- » Recertifying Lifeline Customers
- » Preventing Waste, Fraud & Abuse
- » Q & A

Agenda



» Introduction to the Company

- PhoneAid Communications Corp. incorporated in Florida on April 2, 2009
- Will operate its wireless business as PhoneAid Wireless
- Currently operates its wireline business as PhoneAid Communications and PhoneAid.
- As of October 1st 2012, PhoneAid's customer base consisted of 72% Lifeline and 28% Retail Markets throughout its 3 state territory.

» Names and Identifiers used by the Company

- PhoneAid Communications
- PhoneAid
- PhoneAid Wireless

PhoneAid Wireless



» ETC Designations

- Wireline:
 - Alabama (Aug 2010)
 - Kentucky (Nov 2009)
 - Louisiana (Nov 2010)

» Current Operations (both Lifeline and Retail)

- Wireline: Alabama, Kentucky, and Louisiana

» Transition of our Reputable Brand Name with the same clear and consistent message:



PhoneAid Wireless



- » PhoneAid has the financial capability to provide the supported Lifeline service:
 - 4 years in operation
 - Currently operating both retail and Lifeline in Alabama, Kentucky, and Louisiana
 - Also certified to provide retail wireline in North Carolina
 - Addition of wireless services

Financial Capability



» PhoneAid has the technical capability to provide the supported Lifeline service :

+ Key Management Experience

- **Angela Lemke** – 20 years of Professional Business Experience, with 4 years as CEO of PhoneAid.
- 8 years as CEO in Retail Markets.
- **Joseph Lemke** – 12 Years of Operational & Management Experience in Media Communications, with 4 years as Vice President of PhoneAid.
- 8 Years of Vice President in Retail Markets.

Technical Capability



» Additional Technical Capabilities

+ Facilities

- PhoneAid has the capability to offer its wireless retail and lifeline customers wireless service from its underlying carriers under private label agreements. PhoneAid has developed and implemented through its wireline service capabilities; its back office platform and retail rating and billing systems. Making an easy transition to its wireless service offerings.
- PhoneAid has the technical experience and staff to utilize its own in-house resources for its daily operations, device inventory and logistics to ensure quality customer service, and operational readiness.

Technical Capability



- » PhoneAid proposes the following Lifeline plans:
 - Platinum Lifeline 250 Plan
 - Tribal 1000 Lifeline Plan

- » All plans include:
 - Free handset
 - Free calls to 911 Emergency Services
 - Free Balance Inquiries
 - Free Caller ID and Call Waiting
 - Free Domestic Long Distance

Lifeline Plans



Platinum Lifeline 250 Plan

- » Lifeline Net Cost: **FREE**
- » 250 Anytime Minutes (voice or text)
- » 1 text = 1 minute
- » No Rollover

Tribal 1000 Lifeline Plan*

- » Lifeline Net Cost: **\$1.00**
- » 1000 Anytime Minutes (voice or text)
- » 1 text = 1 minute
- » No Rollover

* only available to Tribal residents

Lifeline Plans



» **All materials will comply with disclosure requirements:**

- Disclose the company name under which it does business;
- Explain in clear, easily understood language the following:
 - ✓ Only eligible consumers may enroll in the program;
 - ✓ What documentation is necessary for enrollment;
 - ✓ The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - ✓ Lifeline is a government benefit program; and
- ✓ Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

Marketing Plan



» PhoneAid intends to market its Lifeline service via:

- Community Events
- TV / Radio spots
- Mailed Marketing Materials
- Flyers
- Brochures
- Internet Banners

Authorized Agent

for
PhoneAid 
 Lifeline Program
www.FreePhoneAid.com

ASK how you can get a **FREE CELL PHONE!**

Includes 250 Free Monthly Minutes

If you receive **Government Assistance**,
 you may qualify for
Government Assisted Cell Phone Service!

- Food Stamps
- Medicaid
- SSI
- Federal Public Housing
- Temporary Assistance to Needy Families
- Low Income Energy Assistance
- National School Free Lunch
- 135% at or below Federal Poverty Guidelines

\$0 Gets You Started!

**Includes a Trendy New Cell
 Phone for Qualified Customers**

Offer subject to change and cancellation without notice. Eligibility is a government benefit program. Customers are required to submit proof of eligibility. Proof of eligibility is required based on all qualified program participants. Only one lifetime discount is available per economic household, consisting of either wireless or wireless service. Customers violating these rules are subject to conceal and/or penalties. For more information on qualification requirements, please visit www.FreePhoneAid.com or call toll-free at 1-877-484-0628. ©2006 FreePhoneAid.com

NO CREDIT CHECK • NO DEPOSIT • NO CONTRACT

Marketing Plan



- » 5 verification checks in real-time:
 1. Service Availability Verification (validates the availability of service to qualifying subscribers through a database of approved PhoneAid service areas, underlying carrier service ability);
 2. Service Address Verification (validates the service address of qualifying subscribers through USPS and/or Melissa databases);
 3. Non-Duplicate Subscriber Verification (confirms internal non-duplicate status of qualifying subscribers by a combination of name, address, telephone number, date of birth and last four digits of Social Security number);
 4. Identity Verification (validates the identity of qualifying subscribers through viewing government issued identification); and
 5. Eligibility Verification (where available, validates the eligibility of qualifying subscribers through state-specific and program specific Internet databases).

Enrolling Lifeline



» End-User Education and Disclosures:

- Lifeline is a federal non-transferable benefit
- Lifeline service is available for only one line per household
- A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
- Households are NOT permitted to receive benefits from multiple providers, and only either wireline or wireless
- Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government

Enrolling Lifeline



» Annual Recertification Compliance:

- PhoneAid commits to re-certify the eligibility of all Lifeline customers as of June 1, 2012 by December 31, 2012 and report the results to USAC.
- After 2012, PhoneAid will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
- All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
- In addition, PhoneAid will continue to follow any state-specific requirements.

Recertifying Lifeline



» Additional Measures to prevent waste, fraud & abuse:

- In addition to the stringent verification procedures that are currently in place as were presented in our enrollment processes today;
- PhoneAid additionally will continue its contracted services with its third party agency to prevent duplicate benefits; preventing waste and eliminating fraud and abuse.
 - Continuance of existing duplicate processes in place will verify and validate the Company's subsidy data to prevent:
 - (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): Any Name/Address/Social Security Number/DOB/Telephone Number that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month;
 - (2) Inactive lines receiving subsidy will be eliminated
 - (3) PhoneAid will use and State verification database made eligible for verification purposes in its service territory, and will utilize the National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits*
 - *if PhoneAid draws \$5 million+ on an annual basis

Preventing Waste, Fraud & Abuse >

QUESTIONS?

PhoneAid⁺[®]

